



INDUSTRY PRODUCTS COMPANY

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EPA Region 5 Records Ctr.



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April 26, 1989

Mr. Anthony J. Rutter
U.S. Environmental Protection Agency
1000 Cambridge Square
Suite D
Alpharetta, GA 30201

RESOURCE APPLICATIONS, INC.
1000 Cambridge Square Ste. D
Alpharetta, GA 30201

RECEIVED
4/28/89

RE: Miami County Incinerator
CERCLA Section 104 (e) Request for Information

Dear Mr. Rutter:

Pursuant to Mr. Norman Niedergang's letter dated March 27, 1989, Industry Products Company hereby submits its responses to EPA's CERCLA Section 104 (e) request for information regarding the Miami County Incinerator site in Troy, Ohio. These responses are submitted without any admission of fault, violation or liability.

I should note at the outset that, to the best of its knowledge, Industry Products did not dispose of, or arrange for the disposal of, any "hazardous substances" at the Miami County Incinerator site in Troy, Ohio. To the best of its knowledge, Industry Products hauled or arranged for the hauling of only construction debris, packing boxes, wood shipping containers and pallets, office waste paper, cardboard and other miscellaneous paper products, plastics, felt, fiber board, various rubber and gasket materials, laminated paper and canvas boards, cold-rolled steel, and

• DIE CUTTING AND FABRICATION OF NON-METALLIC MATERIALS
GASKETS • ELECTRICAL INSULATION • TERMINAL BOARDS • SHROUDS • COPPER SEALS

ordinary trash (beverage cans, floor sweepings, saw dust, food containers, wood scrap, and the like) to the site. To our knowledge, no liquids were ever sent to the site. As such, Industry Products does not believe that it has any liability under CERCLA in connection with the Miami County Incinerator site.

Industry Products' responses are based on a thorough review of existing records and discussions with appropriate parties. In fact, however, with the exception of weigh tickets, the Company has virtually no records of transactions with the Miami County Incinerator facility during the period 1962-1980. To the extent additional relevant information is uncovered, however, Industry Products will promptly provide it to your office.

Please note that Industry Products requests that EPA treat the responses to Items 11, 13 and 14 (regarding certain financial information) as confidential business information.

As a privately-held company, Industry Products does not disseminate information such as financial statements and income tax statements. Similarly, the Company's liability insurance coverage status constitutes extremely sensitive information which would, if disclosed, benefit potential competitors. Such information would provide insights into

the Company's contemplated ventures, strategic planning, and ability to finance future business undertakings.

Industry Products does not disclose this information in the normal course of its business conduct, and distributes such data to a very limited control group.

Consequently, Industry Products respectfully requests that this information not be released. To safeguard non-disclosure, responses to Items 11, 13, and 14 are set forth on the separate attachments to this letter.

Industry Products' responses are as follows:

Question No. 1 - Not Applicable. (Industry Products was not and is not in the business of transporting the wastes of other companies.)

Question No. 2 - Not Applicable. (Industry Products transported only its own wastes to the Miami County Incinerator. It did so periodically from about November 1966 through January 1, 1980.) Various commercial waste haulers may have transported some of Industry Products' wastes to the site prior to 1980.

Question No. 3 - Industry Products generated the following waste streams which could have ended up at the Miami County Incinerator:

Non-liquid (Solid) Waste - Waste generated by:

Office - paper, cardboard, and various other miscellaneous paper products.

Shop and Restroom Trash Containers - paper, paper products, rags, empty paint and solvent cans, beverage cans, floor sweepings, wood scrap, sawdust, and food containers.

Process Wastes (from non-metallic stamping operations) - plastics, felt, cardboard, fiber board, various rubber materials (sponge, foam, and sheet rubbers), gasket materials, laminated paper and canvas boards, and cold-rolled steel.

Shipping/Receiving - paper, boxes, wooden shipping containers, and pallets.

Construction - miscellaneous construction debris.

Liquid Waste

To the best of its knowledge, Industry Products sent no liquids to the site.

Question No. 4 - No materials delivered to the site were marked with warnings as to handling, treatment, or disposal, or marked as hazardous in any manner.

Question No. 5 - See Attachment 1.

Question No. 6 - Industry Products has no such records.

Question No. 7 - See Attachment 1.

Question No. 8 - Industry Products does not know the precise location where some of its wastes may have been taken to the site. According to the weigh tickets which may be found in Attachment 1, most of the wastes which may have ended up at the site would have gone to the incinerator; some would have gone to the landfill. (See Attachment 1.)

Question No. 9 - See response to Question No. 8.

Question No. 10 - Industry Products sent no containers to the site. Industry Products took only loose, uncontained materials to the site. These materials were probably either off-loaded into an incinerator hopper at the site or taken directly to the incinerator. Non-incineratable wastes would probably have been taken directly to the landfill. Industry Products has no knowledge of how the wastes which may have been taken to the site by commercial haulers was handled at the site. However, such wastes would have been loose, uncontained materials when they left Industry Products.

Question No. 11 - See Attachment 1 - Confidential Business Information.

Question No. 12 - See Attachment 2.

Question No. 13 - See Attachment 3 - Confidential Business Information.

Question No. 13 - See Attachment 4 - Confidential Business Information.

Question No. 14 - See Attachment 4 - Confidential Business Information.

Question No. 15 - None other than those listed in response to Question No. 12.

Question No. 16 - None other known except records which may, perhaps, exist at the site.

All of the above responses were researched and prepared by me.

Sincerely,


Kenneth W. Cleveland
President

Attachments